

**IN THE UNITED STATES BANKRUPTCY COURT
FOR THE SOUTHERN DISTRICT OF TEXAS
HOUSTON DIVISION**

In re:

MOUNTAIN EXPRESS OIL COMPANY, et al.,

Debtors.¹

Chapter 11

Case No. 23-90147 (DRJ)

(Jointly Administered)

Related Docket Nos. 283, 288

WITNESS AND EXHIBIT LIST

Mountain Express Oil Company and certain of its affiliates (collectively, the “Debtors”) hereby submits the following *Witness and Exhibit List* (the “Witness and Exhibit List”) with respect to the hearing scheduled on May 25, 2023 at 1:00 p.m. (CT), in the above-captioned bankruptcy cases (the “Cases”), pending before the Honorable David R. Jones, United States Bankruptcy Judge, Courtroom 400, 515 Rusk, Houston, Texas 77002.

WITNESS LIST

The Debtors may call the following witnesses:

1. Craig A. Barbarosh, Independent Director.
2. Lawrence Perkins, Independent Director.
3. Geoffrey Richards, Raymond James & Associates, Inc.
4. Michael Healy, Chief Restructuring Officer.
5. Any witness listed, offered, or called by any other party.
6. Any witness required for rebuttal or impeachment.

¹ A complete list of each of the Debtors in these chapter 11 cases may be obtained on the website of the Debtors’ proposed claims and noticing agent at www.kccllc.net/mountainexpressoil. The location of Debtor Mountain Express Oil Company’s principal place of business and the Debtors’ service address in these Chapter 11 Cases is 3650 Mansell Road, Suite 250, Alpharetta, GA 30022.

EXHIBIT LIST

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
1.	<i>Declaration of Craig A. Barbarosh in Support of Debtors' Motion for Entry of Order (I) Ratifying the Appointment of Independent Directors Effective as of the Petition Date; and (II) Authorizing the Payment of Director Fees [Docket No. 364]</i>				
2.	<i>Declaration of Lawrence Perkins in Support of Debtors' Motion for Entry of Order (I) Ratifying the Appointment of Independent Directors Effective as of the Petition Date; and (II) Authorizing the Payment of Director Fees [Docket No. 365]</i>				
3.	6/13/00 MEOC Articles of Incorporation				
4.	7/28/00 MEOC Bylaws				
5.	3/8/21 MEOC Amended and Restated Shareholder Agreement				
6.	3/15/23 Craig Barbarosh Independent Services Agreement				
7.	3/15/23 Lawrence Perkins Independent Services Agreement				
8.	3/15/23 Written Consent (expanding Board & appointing new Members)				
9.	3/15/23 Written Consent (authorizing Special Transactions Committee)				
10.	05/20/23 Written Consent of the Board of Directors of Mountain Express Oil Company				
11.	<i>Declaration of Geoffrey Richards in Support of Debtors' Application for Entry an Order (I) Authorizing the Employment and Retention of Raymond James & Associates, Inc. as Investment Banker for the Debtors, Effective as of the Petition Date and (II) Granting Related Relief [Docket No. 288-2]</i>				
12.	<i>Supplemental Declaration of Geoffrey Richards in Support of Debtors' Application for Entry an Order (I) Authorizing the Employment and Retention of Raymond James & Associates, Inc. as Investment Banker for the Debtors,</i>				

Exhibit No.	Description	Offered	Objection	Admitted	Disposition After Hearing
	<i>Effective as of the Petition Date and (II) Granting Related Relief</i> [Docket No. 373] REDACTED				
13.	Raymond James Associates Engagement Letter [Docket No. 288-1 pp. 10-25]				
14.	<i>Declaration of Geoffrey Richards in Support of Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Superpriority Administrative Expense Claims, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief</i> [Docket No. 106]				
15.	<i>Declaration of Michael Healy in Support of Debtors' Emergency Motion for Entry of Interim and Final Orders (I) Authorizing the Debtors to (A) Obtain Postpetition Financing and (B) Use Cash Collateral, (II) Granting Liens and Providing Superpriority Administrative Expense Claims, (III) Granting Adequate Protection to Prepetition Secured Parties, (IV) Modifying the Automatic Stay, (V) Scheduling a Final Hearing, and (VI) Granting Related Relief</i> [Docket No. 107]				
16.	Any exhibits listed, designated, or offered by any other party.				
17.	Any exhibits necessary for rebuttal.				
18.	Any pleading or other document filed with the Court on the docket of the above-captioned chapter 11 cases and related adversary proceedings.				

The Debtors reserve the right to modify, amend or supplement this Witness and Exhibit List at any time. The Debtors reserve the right to ask the Court to take judicial notice of pleadings, orders, transcripts and/or documents filed in or in connection with these Cases, to offer rebuttal exhibits, and to supplement or amend this Witness and Exhibit List at any time prior to the May

25, 2023 hearing. Designation of any exhibit above does not waive any objections the Debtors may have to any exhibit listed on any other party's exhibit list.

Dated: May 23, 2023

PACHULSKI STANG ZIEHL & JONES LLP

/s/ Michael D. Warner

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Counsel to the Debtors and Debtors in Possession

CERTIFICATE OF SERVICE

I hereby certify that on this 23rd day of May, 2023, a true and correct copy of the above and foregoing has been served on all parties that are registered to receive electronic transmission through this Court's CM/ECF filing system in these cases.

/s/ Michael D. Warner

Michael D. Warner